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March 14, 2022

VIA ECF

Hon. John P. Cronan
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

A. John P. Mancini
Partner
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Re: **Hartmann v. Google LLC et al.**
1:20-cv-05778-JPC (S.D.N.Y.)

Dear Judge Cronan:

We represent Google LLC and its wholly-owned subsidiary YouTube, LLC (collectively, “Google”) in the above-captioned action. Pursuant to Rule 3.B of Your Honor’s Individual Rules and Practices in Civil Cases, we write jointly with counsel for Plaintiff Ralf Hartmann (“Hartmann”) to respectfully request that: (i) Google’s time to file its Answer to the Second Amended Complaint (“Answer”) be extended from March 22, 2022 to April 21, 2022; and (ii) the Initial Pretrial Conference, presently scheduled for March 23, 2022, be adjourned until May 4, 2022, or as soon thereafter as the Court is available.

This is Google’s first request for an extension of its deadline to file its Answer. Counsel for Google has met and conferred with counsel for Hartmann regarding the proposed extension of Google’s time to file its Answer, and Hartmann’s counsel has indicated his consent.

The parties also met and conferred on the timing of the upcoming Initial Pretrial Conference, currently scheduled for March 23, 2022. The parties jointly believe that the Court will benefit by having Google’s Answer on file prior to the Initial Pretrial Conference and, accordingly, hereby respectfully request an adjournment of the March 23, 2022 Initial Pretrial Conference for thirty (30) days. The requested extension and adjournment do not affect any other scheduled dates.

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Given the foregoing, the parties respectfully submit to extend the below-referenced deadlines as follows:

Event	Current Date	Proposed Date
Google's deadline to file its Answer	March 22, 2022	April 21, 2022
Deadline for parties to file joint letter and proposed Case Management Plan	March 16, 2022	April 27, 2022, or as determined by the Court
Initial Pretrial Conference	March 23, 2022	May 4, 2022, or as soon thereafter as the Court is available

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ A. John P. Mancini

A. John P. Mancini

cc: All Counsel of Record by ECF

The request is granted. Defendant shall answer by April 21, 2022. The previously scheduled Initial Pretrial Conference, Dkt. 50, is adjourned until May 4, 2022 at 9:00 a.m. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261. The parties shall file the required pre-IPTC submissions by April 27, 2022.

SO ORDERED.

Date: March 15, 2022

New York, New York



JOHN P. CRONAN

United States District Judge